

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>DAVID A. DOWS,</b>	:	
	:	
<b>Plaintiff</b>	:	
	:	<b>No. 04-341 Erie</b>
<b>v.</b>	:	<b>Judge McLaughlin</b>
	:	
<b>KATHERINE E. HOLTZINGER</b>	:	
<b>CONNER, ESQ., Chairman</b>	:	
<b>PENNSYLVANIA CIVIL</b>	:	
<b>SERVICE COMMISSION and</b>	:	
<b>JOHN DOE,</b>	:	
<b>Defendants</b>	:	

**MOTION FOR EXTENSION OF TIME FOR  
FILING MOTIONS FOR SUMMARY JUDGMENT  
AND PRE-TRIAL STATEMENTS**

Defendant, the Pennsylvania Civil Service Commission, through its attorneys, request that this Court extend the period of time for filing motions for summary judgment and responses and pre-trial statements by one week and state the following in support:

1. By Order dated January 9, 2006, the Court granted the parties' motion to extend discovery and set the following deadlines: discovery to end March 6,

2006, Plaintiff's pre-trial statement and any motions for summary judgment due by March 27, 2006, and any responses to any motions for summary judgment and Defendant's pre-trial statement due by April 17, 2006.

2. The parties have completed the discovery process.

3. Defendant will be filing a motion for summary judgment and Plaintiff has indicated he may do the same.

4. Due to scheduling and a planned vacation, Defendant's counsel now seeks an additional week in which to file a motion for summary judgment.

5. In order to allow adequate time to respond and to file pre-trial statements, undersigned counsel also requests that the remaining dates also be extended by one week.

6. Counsel for Plaintiff, William Taggart, has been consulted and concurs in the motion for extension of time.

WHEREFORE, Defendant respectfully request that the Court extend the deadline for any motions for summary judgment and Plaintiff's pre-trial statement to April 3, 2006, and extend the time for any responses to motions for summary judgment and Defendant's pre-trial statement to April 24, 2006.

**Respectfully submitted,**

**THOMAS W. CORBETT, JR.**  
**Attorney General**

**By:** Linda S. Lloyd

**LINDA S. LLOYD**  
**Senior Deputy Attorney General**  
**Attorney ID 66720**

**SUSAN J. FORNEY**  
**Chief Deputy Attorney General**  
**Chief, Civil Litigation Section**

**Office of Attorney General**  
**15<sup>th</sup> Floor, Strawberry Square**  
**Harrisburg, PA 17120**  
**Phone: (717) 705-7327**  
**Fax: (717) 772-4526**  
**[llloyd@attorneygeneral.gov](mailto:llloyd@attorneygeneral.gov)**

**Date: March 21, 2006**

**Counsel for Defendant**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>DAVID A. DOWS,</b>	:	
	:	
<b>Plaintiff</b>	:	
	:	<b>No. 04-341 Erie</b>
<b>v.</b>	:	<b>Judge McLaughlin</b>
	:	
<b>KATHERINE E. HOLTZINGER</b>	:	
<b>CONNER, ESQ., Chairman</b>	:	
<b>PENNSYLVANIA CIVIL</b>	:	
<b>SERVICE COMMISSION and</b>	:	
<b>JOHN DOE,</b>	:	
	:	
<b>Defendants</b>	:	

**CERTIFICATE OF SERVICE**

I, Linda S. Lloyd, Senior Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on March 21, 2006, I caused to be served a true and correct copy of the foregoing document titled Motion for Extension of Time to File Summary Judgment Motions and Pre-trial Statements by electronic means to the following:

**William Taggart, Esquire**  
**1400 Renaissance Centre**  
**1001 State Street**  
**Erie, PA 16501-1834**  
*Counsel for Plaintiff*

Linda S. Lloyd  
**LINDA S. LLOYD**  
Senior Deputy Attorney General